

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CRIMINAL NO. 4:22-cr-00033
	§	
HEATHER ANN CAMPOS, et al	§	

MOTION TO CONTINUE

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE KEITH P.
ELLISON:

COMES NOW STEVEN MORIZONO, defendant, joined by others and unopposed by several, by and through his attorney of record, Mary Elizabeth Conn, and hereby requests this honorable court grant this motion to continue scheduling order and trial, upon the following:

I.

Mr. Morizono makes this request for a continuance of the Scheduling Order. As stated in previously, this case is certified as complex, and discovery is voluminous. Undersigned Counsel needs ample time to review, analyze and discuss this voluminous discovery with Mr. Morizono.

II.

The Government is unopposed to this request.

III.

This Motion is not made for the purpose of mere delay, but in the interests of justice. Counsel requests this continuance right to effective assistance of counsel.

WHEREFORE PREMISES CONSIDERED, Mr. Morizono respectfully requests this motion granted, and that the Court enter a new Scheduling Order, allowing sufficient time for all Counsel to prepare.

WHEREFORE, PREMISES CONSIDERED, Defendant prays this court grant this motion and for such other and further relief, general or special, at law or in equity, to which she may show herself justly entitled.

Respectfully submitted,
FREEDOM LAW, PLLC
/s/ Mary Elizabeth Conn
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Continue was delivered via electronic filing to the Assistant United States Attorney and to all counsel in this cause on this February 28, 2024.

/s/ Mary Elizabeth Conn
Mary Elizabeth Conn

CERTIFICATE OF CONFERENCE

I hereby certify that the undersigned, Mary Elizabeth Conn, contacted Assistant United States Attorney Carrie Wirsing, and/or Jay Hileman, AUSA's on this case, and they are unopposed to the request. Further, Counsel for Mr. John Taylor Blackmore is unopposed, as are counsel for Ms. Heather Ann Campos, Ms. Blanka Uhrovckova, Ms. Arleen Marie Grockett, Ms. Melinda Munoz, Ms. Elvina Buckley, Mr. Richard Grassie, and Mr. Luis Giancarlo Belevan. I was not able to contact counsel for Ms. Kimberli Ann Todman.

/s/ Mary Elizabeth Conn
Mary Elizabeth Conn